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April 14, 2015

National Freedom of Information Officer  
Attn: Rachel Deitz, Office of Underground Storage Tanks FOIA Contact  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2822T)  
Washington, DC 20460

Dear FOIA Records Custodian:

We have been retained by Ronnie Abner, a driver of a fuel transport hauler, to investigate a potential personal injury claim resulting from injuries Mr. Abner sustained while unloading fuel into recently constructed (under construction) underground fuel storage tanks located at or near the Love's Travel Center, No. 355, (owner Love's Travel Stops and Country Stores), 13615 Blue Lick Road, Memphis, IN 47143 (on I-65, Exit 16) on or about August 15, 2013.

It is our understanding that the owner was in the process of constructing, removing, remediating, and/or installing new underground fuel storage tanks (USTs) at this location around the time of Mr. Abner's injury in order to comply with new environmental regulations governing USTs.

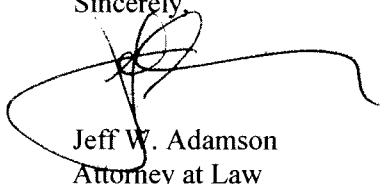
Please allow this letter to serve as an Open Records Request for any and all records, including, but not limited to, any and all documents and other tangible things pertaining to reporting, operator(s), certification, certification applications, repair, remediation, notices, registration, Employer Identification Numbers, fees, assessments, investigations, inspections, maintenance, reports, reporting, revocations, permits, permit applications, testing, compliance, construction, installation, summaries, plans, drawings, diagrams, specifications, measurements, photographs, design, cleanup, manifests, complaints, notes, memoranda, and the like maintained, stored or otherwise kept at the EPA (and/or Office of Underground Storage Tanks) with respect to the facility and land at or near 13615 Blue Lick Road, Memphis, IN 47143.

We are especially interested in obtaining records pertaining to the ownership of the land containing the subject USTs; the identity of the contractor or contractors performing any and all remediation, construction, removal and installation of USTs at the above location; the ownership of the subject USTs, and the identity of the entity or entities operating the subject USTs.

Please do not hesitate to contact me if you have any questions regarding this Open Records Request.

Thank you for your attention and cooperation in this matter.

Sincerely,



Jeff W. Adamson  
Attorney at Law